REMARKS

Reconsideration is respectfully requested.

Claims 1, 2 (3 was previously cancelled), 7-12, 15, 16, 19 and 20 were rejected under 35 U.S.C. 103(a) as being unpatentable over Vaid et al. (US 6,502,131) in view of Durham et al. (US 6,601,082). Claims 21, 22, 24-28, 30 and 31 were rejected under 35 U.S.C. 103(a) as being unpatentable over Natarajan et al. (US 6,584,502) in view of Durham. Claims 5 and 6 were rejected under 35 U.S.C. 103(a) as being unpatentable over Vaid in view of Durham and in view of Stevens et al. (US 6,539,425). Claim 13 was rejected under 35 U.S.C. 103(a) as being unpatentable over Vaid in view of Durham and in view of Rail (US 6,275,844). Claim 14 was rejected under 35 U.S.C. 103(a) as being unpatentable over Vaid in view of Durham and in view of Chao (US 6,393,485). Claims 17 and 18 are apparently rejected under 35 U.S.C. 103(a) as being unpatentable over Vaid in view of Durham.

1. Obviousness rejection of Claims 1, 2, 7-12, 15, 16, 19 and 20 based on Vaid in view of Durham.

The principle reference of Vaid is said to lack the subject matter of the fifth paragraph of independent claim 1 reciting that "said policies are based on a policy definition language that defines (1) primitive events representing a single network element event, (2) basic events representing a group of primitive events occurring within a single time epoch, (3) complex events representing an accumulation of primitive events over plural time epochs, (4) internal events generated in response to network elements failing to take required actions, and (5) policy defined events generated by said policies according to policy defined event rules." Although Durham is said to supply disclosure of these various event types (e.g., as per Fig. 3b), the policy

tree of Durham does not appear to be directed to network events generally, let alone the five event types in the above-quoted passage.

The Durham policy tree of Fig. 3b comprises the following five levels: (1) an action type level comprising types of network service (e.g., physical or logical resources) that can be requested by a requestor (e.g. element 50 in Fig. 1a); (2) an action level comprising actions linked to the action types of level one (e.g., a 1 Mbps line (physical resource) or an IP multicast channel (logical resource)); (3) a rule level comprising policy rules for permitting the actions defined in the action level; (4) a conditions type level comprising the types of conditions that must be present for the rules of the rule level to operate (e.g., requestor identifications, source/destination addresses, etc.); and (5) a conditions level comprising conditions linked to the condition types. See column 4, line 26 through column 5, line 23 of Durham.

The foregoing levels of Durham's Fig. 3b tree do not appear to correspond in any way to the five events recited in claim 1, namely (1) primitive events representing a single network element event, (2) basic events representing a group of primitive events occurring within a single time epoch, (3) complex events representing an accumulation of primitive events over plural time epochs, (4) internal events generated in response to network elements failing to take required actions, and (5) policy defined events generated by said policies according to policy defined event rules. Relative to primitive events, none of Durham's levels appears to teach or suggest the concept of a single network element event. Relative to basic events, none of Durham's levels appears to teach or suggest the concept of a group of primitive events or the concept of a single time epoch. Relative to complex events, none of Durham's levels appears to teach or suggest the concept of an accumulation of primitive events or the concept of plural time epochs. Relative to internal events, none of Durham's levels appears to teach or suggest the concept of events

generated in response to network elements failing to take required actions. Relative to policy defined events, none of Durham's levels appears to teach or suggest the concept of events generated by policies (as opposed to actions generated by policies).

In view of the foregoing, even assuming a person of ordinary skill in the art chose to modify Vaid to incorporate a policy tree as disclosed by Durham, the result would have been different that the subject matter of claim 1 insofar as the resultant system would still lack policies based on a policy definition language that defines the five above-discussed events.

In view of the foregoing, it is respectfully submitted that the obviousness rejection of claim 1 has been overcome. As such, dependent claims 2, 7-12, 15, 16, 19 and 20 must also be considered to overcome the obviousness rejection applied thereto.

In addition, at least one of the dependent claims contains additional limitations not found in the references, namely:

Claim 16 – Vaid does not disclose an administrative module implementing a graphical user interface for tracing policies run by said policy processing point, said interface being configured to allow users to select actions and trigger events involved in said policies, and to trace sources that cause said actions or trigger said events. Although Figs. 9-15 of Vaid, which are relied on to reject claim 16, depict administrative GUIs, the functionality specified in claim 16 does not appear to be present.

2. Obviousness rejection of Claims 21, 22, 24-28, 30 and 31 based on Natarajan in view of Durham.

The principle reference of Natarajan is said to lack the subject matter of the fifth paragraph of independent claims 21 and 27 reciting that "said policies are based on a policy definition language that defines (1) primitive events representing a single network element event,

(2) basic events representing a group of primitive events occurring within a single time epoch, (3) complex events representing an accumulation of primitive events over plural time epochs, (4) internal events generated in response to network elements failing to take required actions, and (5) policy defined events generated by said policies according to policy defined event rules." As is the case with claim 1, Durham fails to supply these missing teachings, as described in detail above.

In view of the foregoing, it is respectfully submitted that the obviousness rejection of claims 21 and 27 has been overcome. As such, dependent claims 22, 24-26, 28, 30 and 31 must also be considered to overcome the obviousness rejection applied thereto.

3. Obviousness rejection of Claims 5 and 6 based on Vaid in view of Durham and in view of Stevens.

Claims 5 and 6 depend from independent claim 1 and should be allowable for the same reasons. In addition, with respect to claim 6, neither Vaid, Durham or Stevens discloses or suggests (alone or in combination) the claimed system wherein an event filter in a policy proxy is configured to perform one or more of processing events into a device independent format, aggregating primitive events into basic or complex events, and raising internal events that reflect non-occurrence of expected events. Column 4, lines 41-49 of Stevens, which is relied on to reject claim 6, mentions storing local policy definitions at policy-enabled devices, but none of the three features recited in claim 6 are mentioned; namely: (1) processing events into a device independent format; (2) aggregating primitive events into basic or complex events; and (3) raising internal events that reflect non-occurrence of expected events.

4. Obviousness rejection of Claim 13 based on Vaid in view of Durham and in view of Rail.

Claim 13 should be allowable for the same reasons as claim 1, from which it depends.

5. Obviousness rejection of Claim 14 based on Vaid in view of Durham and in view of Chao.

Claim 14 should be allowable for the same reasons as claim 1, from which it depends.

6. Obviousness rejection of Claims 17 and 18 based on Vaid in view of Durham.

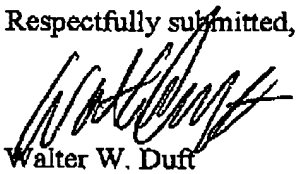
Claims 17 and 18 should be allowable for the same reasons as claim 1, from which they depend. In addition, as to claim 17, Vaid does not disclose or suggest a system as claimed including a debugging tool for testing and debugging policies, said debugging tool being responsive to questions about said policies under hypothetical circumstances by providing information about operational conditions of said system under said circumstances. In column 17, lines 8-10 of Vaid, which is relied on to reject claim 17, it is only stated that policy validation prevent users from defining contradictory or ambiguous rules. It would not have been obvious from this limited functionality of Vaid to conceive a system as recited in claim 17 wherein a debugging tool is responsive to questions about policies under hypothetical circumstances. This represents substantial additional capability that is neither explicitly nor impliedly suggested by Vaid.

As to claim 18, Vaid does not disclose or suggest a system as claimed wherein said debugging tool is configured to respond to (1) queries requesting an event history that will trigger a specified action or sequence of actions, and (2) queries requesting completion of an event history until a specified action is triggered. In column 17, lines 8-10 of Vaid, which is relied on to reject claim 18, it is only stated that policy validation prevent users from defining contradictory or ambiguous rules. It would not have been obvious from this limited functionality

of Vaid to conceive a system as recited in claim 18 wherein a debugging tool is configured to respond to (1) queries requesting an event history that will trigger a specified action or sequence of actions, and (2) queries requesting completion of an event history until a specified action is triggered. This represents substantial additional capability that is neither explicitly nor impliedly suggested by Vaid.

In view of the foregoing, Applicants respectfully request that all rejections be withdrawn and that Notices of Allowability and Allowance be duly issued.

Respectfully submitted,



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